

ORRES CONTROL
JTGGOING LTR NO

ORDER#

4 RFO1260

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ALY TJ	
DAHL T	
BIG JG	
TCHINS NM	
BY WA	
ESTER AW	
HAFFEY JW	
NN HP	
RX GE	
DONALD MM	
KENNA FG	X
ONTROSE JK	X
ORGAN RV	X
ITTER, GL	
ZUTO VM	
SING TL	
NOLIN, NB	
TLOCK GH	
EWART DL	
LLIVAN MT	
ANSON ER	
LKINSON RB	
LIAMS S (ORC)	
LSON JM	
ANT, RD	
Hubert, A.L.	X
ter, K.B.	X
Whiting, M.T.	X
With, P.R.	X
Wright, D.	X
Wright, R.C.	X
Wright, S.	X
ORRES CONTROL	X X
MN RECORD/080	
TS/T130G	
AFFIC	

ASSIFICATION

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CLASSIFIED	X
CONFIDENTIAL	
SECRET	

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SIGNATURE

MD Shepard
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REPLY TO RFP CC NO

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PARTIAL/OPEN

7 CLOSED

TR APPROVALS

FIG & TYPIST INITIALS

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EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC
ROCKY FLATS PLANT P O BOX 464 GOLDEN COLORADO 80402 0464 (303) 966 7000

January 28, 1994

David G Ruscitto
Operations and Waste Management
DOE, RFO

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) UNIT 15A (904 PAD TENTS)
CONTAINER STORAGE COMPLIANCE ISSUES - TGH-041-94

Efforts to bring RCRA Unit 15A (pondcrete and saltcrete container storage units on the 904 Pad) into RCRA compliance have been underway for a number of months. As you may be aware, the storage of pondcrete and saltcrete on the 904 Pad is deficient with the requirements of the Colorado Hazardous Waste Regulations for aisle space, container inspectability and, potentially, container integrity. The most recent efforts to bring the pondcrete and saltcrete waste containers into compliance have focused on changing the present RCRA container storage unit to a RCRA waste pile unit. Technical issues in meeting the regulatory requirements for a waste pile have delayed the completion of this process.

EG&G Rocky Flats, Inc (EG&G) recommends that future efforts to achieve compliance for the 904 Pad be concentrated on compliant container storage. We believe that compliant container storage is the most expeditious route to RCRA compliance. The Department of Energy, Rocky Flats Office (DOE, RFO) Solar Ponds Program staff has informally directed EG&G to discontinue the effort to permit the 904 Pad Tents as a waste pile because of these technical issues. The decision to discontinue the waste pile permitting effort has also been informally communicated to the Colorado Department of Health by the DOE, RFO Solar Ponds Project staff.

I have scheduled a meeting with the affected EG&G organizations for Monday, January 31, 1994, to determine the strategy and schedule for achieving compliant container storage on the 904 Pad. It is anticipated a recommended action plan to achieve compliance will be generated by Friday, February 4, 1994. The action plan will be forwarded to you for your review soon thereafter. EG&G will also determine the funding impacts that result from the effort to achieve compliant container storage.

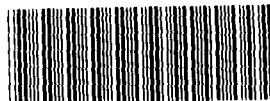
If you have any questions concerning this matter, please contact me at extension 4111, or Steve Keith of the Solar Ponds Project at extension 8541.

T G Hedahl, Associate General Manager
Environmental and Waste Management

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Orig and 1 cc - D G Ruscitto

cc
F R Lockhart - DOE, RFO



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